

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
James D. Kintigh,	:	Bankruptcy No. 15-20410-GLT
Debtor.	:	
	:	Chapter 13
James D. Kintigh	:	
Movant,	:	Related to
	:	Document No. 105-104

vs.

BAC Home Loan Servicing, LP, Credit	:	
Acceptance, Recovery Management Systems	:	
Corporation, Deutsche Bank National Trust	:	
Company, Milstead & Associates, LLC, Office of	:	
the United States Trustee, Select Portfolio Servicing:	:	
Inc., Select Portfolio Servicing and Ronda J.	:	
Winnecour,	:	
Respondents.	:	

**ANSWER TO TRUSTEES CERTIFICATE OF DEFAULT REQUESTING DISMISSAL  
OF CASE**

**AND NOW**, comes the Debtor, James D. Kintigh, by and through his attorney, Lawrence R. Burns, Esquire, and files the within Answer to the trustee's certificate for Dismissal of Chapter 13 Bankruptcy Case Number 15-20410-GLT, and in support thereof avers as follows:

1. On or about February 10, 2015, Debtor filed a voluntary Chapter 13 Bankruptcy Petition.
2. The Last confirmed plan required the Debtor to pay \$2,927.00 per month.
3. The Trustee filed a Certificate of Default on June 14, 2019 that stated the Debtor's plan was in default by \$17,186.00 including the payment that was due in June of 2019.
4. Since that time the Debtor, as shown on the trustee's site, has made a \$6000.00 payment on or about June 15, 2019, and another \$5000.00 payment on or about July 14, 2019, bringing the alleged arrearages down to approximately \$9,113.00.

5. Prior to making the increased payments the Debtor sent a note of explanation to the Trustee for the missed payments.
6. The Debtor plans on making another \$8000.00 payment on or about July 30, 2019 which should bring him substantially in compliance with the already confirmed plan.
7. A copy of the payment will be furnished as soon as the payment is sent today.
8. This plan is in its 55<sup>th</sup> month of a 60 month plan.
9. The plan base according to the Trustee's site is approximately \$140,000.00 with the Debtor already having paid in \$126,000.00 according to the trustee's site and the additional \$8,000.00 will bring the total to \$134,000.00 with only a few months remaining to successfully complete the plan,
10. The Answer in this case has been filed in good faith, and the Debtor prays that with these actions the trustee will withdraw the Request for Dismissal of Case No. 15-20410-GLT so that the Debtor may continue with his bankruptcy.

**WHEREFORE**, it is respectfully requested that upon receipt of proof of the \$8,000.00 payment to the trustee that the Court not Dismiss this case.

Respectfully Submitted,  
/s/ Lawrence R. Burns, Esquire  
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